

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

CLERK OF DISTRICT COURT  
NORTHERN DIST. OF TX  
LUBBOCK DIVISION

2022 OCT 12 AM 11:35

DEPUTY CLERK

UNITED STATES OF AMERICA

v.

HALEY SHAWN BENEDETTI

No. **5-22CR0096-H**

**INDICTMENT**

The Grand Jury Charges:

**Purpose of the Scheme and Artifice**

1. On or about December 20, 2021, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Haley Shawn Benedetti**, defendant, did knowingly execute, and attempt to execute, a bank fraud scheme. Specifically, **Benedetti** used materially false and fraudulent pretenses, representations, and promises to obtain money and other property from City Bank.

**Manner and Means of the Scheme and Artifice to Defraud**

2. In furtherance of her scheme and artifice to defraud, and for the purpose of executing the scheme and artifice, **Benedetti** applied for and obtained a car loan in the approximate amount of \$61,182.62 from City Bank under the guise of another person; she represented to the bank that she was C.R., an actual person.

3. In furtherance of her scheme and artifice to defraud, and for the purpose of executing the scheme and artifice, and in connection with the loan application process,

**Benedetti** provided to City Bank identifying information that belonged to C.R.

4. In furtherance of her scheme and artifice to defraud, and for the purpose of executing the scheme and artifice, and in connection with the loan application process, **Benedetti** provided to City Bank a counterfeit Texas driver's license with her own photograph and C.R.'s identifying information.

5. In furtherance of her scheme and artifice to defraud, and for the purpose of executing the scheme and artifice, and in connection with the loan application process, **Benedetti** signed the loan application documents, including the promissory note, under C.R.'s name.

6. The representations and statements **Benedetti** made to City Bank were false because, as **Benedetti** then and there well knew, she was not C.R. and the identifiers she provided to City Bank belonged to C.R. and were not her own. These false representations had a natural tendency to influence and were capable of influencing the bank to provide **Benedetti** with the car loan she requested.

Count One  
Bank Fraud  
(Violation of 18 U.S.C. § 1344(2))

1. The grand jury adopts and realleges the allegations in the introductory paragraphs one through six of this indictment as though fully set forth in this Count.

2. On or about December 20, 2021, in the Lubbock Division of the Northern District of Texas, **Haley Shawn Benedetti**, defendant, knowingly executed a scheme and artifice to obtain monies and other property from a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, that is, City Bank, by means of materially false and fraudulent pretenses, representations, and promises.

In violation of Title 18, United States Code, Section 1344(2).

Count Two  
Aggravated Identity Theft  
(Violation of 18 U.S.C. § 1028A)

1. The grand jury adopts and realleges the allegations in the introductory paragraphs one through six of this indictment as though fully set forth in this Count.
2. On or about December 20, 2021, in the Lubbock Division of the Northern District of Texas, **Haley Shawn Benedetti**, defendant, knowingly possessed and used, without lawful authority, a means of identification of another person, that is, C.R., during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), that is, Bank Fraud, as alleged in Count One of this indictment, knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Section 1028A.

Count Three

False Statement to a Bank  
(Violation of 18 U.S.C. § 1014)

1. The grand jury adopts and realleges the allegations in the introductory paragraphs one through six of this indictment as though fully set forth in this Count.
2. On or about December 20, 2021, in the Lubbock Division of the Northern District of Texas, **Haley Shawn Benedetti**, defendant, knowingly made a false statement for the purpose of influencing the lending action of City Bank, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), that is, Benedetti falsely stated during the loan application process that she was C.R., knowing that her statement was false when she made it.

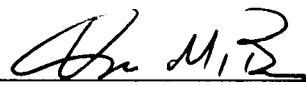
In violation of Title 18, United States Code, Section 1014.

Count Four  
Possession of Stolen Mail  
(Violation of 18 U.S.C. § 1708)

On or about July 12, 2022, in the Amarillo Division of the Northern District of Texas, **Haley Shawn Benedetti**, defendant, did unlawfully have in her possession checks belonging to M.P. that had been stolen from the mail, post office, letter box, mail receptacle, and authorized depository for mail, knowing the checks to be stolen and possessing them with the intent to do so unlawfully.

In violation of Title 18, United States Code, Section 1708.

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON

CHAD E. MEACHAM  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
ANN HOWEY

Assistant United States Attorney  
Texas State Bar No. 24032312  
1205 Texas Avenue, Suite 700  
Lubbock, Texas 79401  
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

LUBBOCK DIVISION

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HALEY SHAWN BENEDETTI

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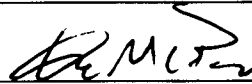
INDICTMENT

COUNT 1: BANK FRAUD  
Title 18, United States Code, Section 1344(2).  
COUNT 2: AGGRAVATED IDENTITY THEFT  
Title 18, United States Code, Section 1028A.  
COUNT 3: FALSE STATEMENT TO A BANK  
Title 18, United States Code, Section 1014.  
COUNT 4: POSSESSION OF STOLEN MAIL  
Title 18, United States Code, Section 1708.  
(4 COUNTS)

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A true bill rendered:

Lubbock



Foreperson

Filed in open court this 12<sup>th</sup> day of October, A.D. 2022.

Clerk

ARREST WARRANT TO ISSUE

  
UNITED STATES MAGISTRATE JUDGE